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GEORGE J. MILLER  
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February 21, 1985

HAND DELIVER

Joseph J. C. Donovan, Esquire  
Office of Regional Counsel  
U. S. Environmental Protection Agency  
Region III  
The Curtis Building  
Sixth and Walnut Streets  
Philadelphia, PA 19106

Re: Tyson's Lagoon  
U.S.A. v. Franklin P. Tyson, et al.

Dear Mr. Donovan:

You may recall that at our meeting to discuss CIBA-GEIGY's position with respect to whether or not it alone or with other defendants might be willing to execute an excavation remedy we asked you to supply us promptly with the information requested by our Request for Production of Documents. Very little of that information has been forthcoming for one reason or another and it seriously handicaps our ability to make a response.

I would very much appreciate it if you could promptly see that we are supplied with the following information well in advance of our meeting on the 27th:

1. Documents reflecting EPA's cost estimates of excavation of the lagoons.
2. Documents reflecting EPA's calculations of the amount of material which will have to be removed under the excavation alternative.

We would also like to have the well and well construction logs which I understand you are having some difficulty in finding. However, I would like to have the items listed above as promptly as possible.

Very truly yours,

*George J. Miller*  
George J. Miller

GJM/cob  
cc: Michael L. Martinez, Esquire

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